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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

\*E-FILED - 7/12/06\*

UNITED STATES OF AMERICA,	)	No. 06-00318 RMW
	)	
Plaintiff,	)	
	)	STIPULATION AND []
v.	)	ORDER EXCLUDING TIME
	)	
ISABEL ZURITA-NUNEZ,	)	
	)	
Defendant.	)	SAN JOSE VENUE
	)	

On June 26, 2006, the parties in this case appeared before the Court for a status hearing. Assistant Federal Public Defender Lara Vinnard explained to the Court that the government has extended a "fast-track" offer to the defendant, and that she needs time to review the offer and conduct further investigation. Therefore, the parties requested that the case be continued to July 17, 2006. In addition, the parties requested an exclusion of time under the Speedy Trial Act from June 26, 2006 to July 17, 2006. The defendant, through AFPD Vinnard, agreed to the exclusion. The undersigned parties agree and stipulate that an exclusion of time is appropriate based on the defendant's need for effective preparation of counsel.

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SO STIPULATED:

KEVIN V. RYAN  
United States Attorney

DATED: \_\_\_\_\_

/s/  
SUSAN KNIGHT  
Assistant United States Attorney

DATED: \_\_\_\_\_

/s/  
LARA S. VINNARD  
Assistant Federal Public Defender

Accordingly, for good cause shown, the Court HEREBY ORDERS that time be excluded under the Speedy Trial Act from June 26, 2006 to July 17, 2006. The Court finds, based on the aforementioned reasons, that the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendant in a speedy trial. The failure to grant the requested continuance would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would result in a miscarriage of justice. The Court therefore concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv).

SO ORDERED.

DATED: 7/12/06

/S/ RONALD M. WHYTE  
RONALD M. WHYTE  
United States District Judge